

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SHAILA BERNARD,

Plaintiff,

v.

RTX CORPORATION, f/k/a RAYTHEON
TECHNOLOGIES CORPORATION

Defendant.

Case No. 3:24-cv-02944-X

UNOPPOSED MOTION TO PROCEED WITHOUT LOCAL COUNSEL

Defendant Raytheon Company, improperly identified in the caption as “RTX Corporation, f/k/a Raytheon Technologies Corporation” moves this Court to permit its attorney, Esteban Shardonofsky, to represent Defendant in this lawsuit without local counsel pursuant to Local Civil Rule LR 83.10, and in support thereof show as follows:

1. This is an employment case involving claims of failure to accommodate, discrimination, and retaliation under the Americans with Disabilities Act.
2. Defendant’s attorney, Esteban Shardonofsky, is an attorney with Seyfarth Shaw LLP. He maintains an office in Houston, Texas. He has been licensed to practice in Texas since 2005, has been admitted to practice in the Northern District of Texas since May 18, 2011, and is also admitted to practice in the Eastern, Southern, and Western Districts of Texas. In addition, he is also admitted to practice before the United States Courts of Appeals for the Fifth and Tenth Circuits.

3. Mr. Shardonofsky is fully familiar with the Local Rules of this District, and has previously represented and is currently representing other defendants in numerous matters pending in this District.

4. Defendant seeks to avoid incurring the additional expense of retaining local counsel in addition to Mr. Shardonofsky in its defense of this lawsuit, which is the reason for this Motion.

5. On December 16, 2024, counsel for Defendant conferred with Plaintiff's counsel who indicated that Plaintiff does not oppose the relief sought by Defendant.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Court grant its Motion, and grant Defendant such other relief to which it is entitled. A proposed Order is enclosed.

DATED: December 17, 2024

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Esteban Shardonofsky

Esteban Shardonofsky
Texas Bar No. 24051323
sshardonofsky@seyfarth.com
SEYFARTH SHAW LLP
700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

On December 16, 2024, Defendant's counsel conferred with Plaintiff's counsel regarding this motion.

/s/ Esteban Shardonofsky
Esteban Shardonofsky

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served upon the person(s) listed below via the Court's CM/ECF electronic filing system on this 17th day of December, 2024:

Donald E. Uloth
Law Office of Donald E. Uloth
182028 Preston Road, Suite D-9 #261
Dallas, Texas 75252

ATTORNEY FOR PLAINTIFF

/s/ Esteban Shardonofsky
Esteban Shardonofsky